

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GBM Global Holding Company Limited

*Plaintiff,*

v.

The Unidentified Individuals Listed On  
Schedule A,

*Defendants*

Case No. 1:21-cv-06284

**Declaration of Angus F. Ni in Support of  
Petition for Temporary Restraining Order  
in Aid of Arbitration**

I, **ANGUS F. NI**, declare as follows:

1. I am counsel for Plaintiff in the above-captioned action.
2. Attached to this declaration as **Exhibit A** is a true and correct copy of an article entitled “Decentralized Applications, Harnessing Bitcoin’s Blockchain Technology”, which sets out an overview of blockchain technology.
3. Attached to this declaration as **Exhibit B** is a true and correct copy of a complaint to the FBI filed by **Bachi Tech Corporation**, Plaintiff’s subsidiary that operates the BitMart exchange.
4. Attached to this declaration as **Exhibit C** are true and correct copies of emails between Plaintiff and other cryptocurrency exchanges such as Binance and Huobi requesting for a freeze of accounts holding cryptocurrencies that were transferred from the BitMart exchange.
5. Attached to this declaration as **Exhibit D** is a true and correct copy of BitMart’s user agreement with Defendants.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information, and belief.

Signed this July 23, 2021

By: \_\_\_\_\_  
Angus F. Ni.

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